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INDEMNITY COMPANY

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARYLAND CASUALTY COMPANY,
NORTHERN INSURANCE COMPANY OF
NEW YORK,

Plaintiffs,
vs.

AMERICAN SAFETY INDEMNITY
COMPANY, AMERICAN SAFETY
CASUALTY INSURANCE COMPANY,

Defendants.

Case No.: 2:10-cv-02001-MMD-PAL

**JOINT STATUS REPORT PURSUANT
TO ORDER REGARDING STATUS OF
SETTLEMENT NEGOTIATIONS
[DOC. #45]**

1 Pursuant to this Court's Order (Doc. #45), dated July 5, 2013, in the above-referenced
2 action, plaintiffs, MARYLAND CASUALTY INSURANCE COMPANY and NORTHERN
3 INSURANCE COMPANY OF NEW YORK ("Plaintiffs"), and defendant, AMERICAN SAFETY
4 INDEMNITY COMPANY ("Defendant") ("the Parties"), hereby provide a Joint Report regarding
5 the status of settlement negotiations, which began at the Settlement Conference conducted on June
6 18, 2013 before the Honorable Magistrate Judge Peggy A. Leen.

7 WHEREAS:

8 1. On June 25, 2013, the Parties' respective counsel participated in a telephonic Status
9 Conference with the Court and advised the Court that the Parties have agreed upon the essential
10 terms of a partial settlement.

11 2. Following the June 25, 2013 Status Conference, the Court ordered that the Parties
12 shall have until and July 9, 2013, to file a stipulation and proposed order or, if unable to finalize a
13 stipulation, a Joint Status Report indicating when the stipulation will be filed.

14 3. Since the June 25, 2013 Status Conference, the Parties' respective counsel have
15 continued their efforts to finalize a stipulation and confer with their client(s) concerning certain
16 proposals and counter-proposals to the terms of a stipulation.

17 4. Since the Order (Doc. #45) was entered on July 5, 2013, the Parties' good faith
18 settlement negotiations have resulted in further progress. The current status is that the Parties are
19 contemplating a settlement proposal that would resolve the entire action instead of the previous
20 option of a partial settlement.

21 5. The Parties require additional time in which to confer with their respective client(s)
22 and obtain authority for the terms of a final stipulation for a complete resolution of the action, and if
23 not, to finalize a stipulation regarding a partial settlement of the suit.

24 6. The Parties anticipate that a final resolution of a settlement, whether in whole or in
25 part, will be completed pursuant to Stipulation within the next 30 calendar days, if not sooner, or by
26 August 15, 2013.

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Respectfully submitted this 16th day of July, 2013.

By /s/ Ramiro Morales
 Ramiro Morales
 David A. Astengo
 Attorneys for Plaintiffs,
 MARYLAND CASUALTY
 COMPANY and NORTHERN INSURANCE
 COMPANY OF NEW YORK

By /s/ Pamela McKay
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AMERICAN SAFETY INDEMNITY
COMPANY

Date: July 44, 2013

Terry A. Jean
UNITED STATES MAGISTRATE JUDGE